

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

In re	§	Chapter 11
	§	
BRIGGS & STRATTON	§	Case No. 20-43597-399
CORPORATION, <i>et al.</i> ,	§	
	§	(Jointly Administered)
Debtors.	§	
	§	

**DANTHERM S.p.A.’S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
PLAN ADMINISTRATOR’ OBJECTION TO CREDITOR’S DANTHERM S.p.A.’s  
RECLAMATION CLAIM IN AMENDED CLAIM No. 53-3**

NOW COMES Dantherm S.p.A. (“**Dantherm**”), by and through its undersigned counsel, and states as follows for its motion for an extension of time with which to file its Response to Plan Administrator’s Objection to Creditor Dantherm S.p.A.’s Reclamation Claim in Amended Claim No. 53-3 [ECF No. 2000]:

1. Lead counsel for Dantherm in this matter intended to file its Response Response to Plan Administrator’s Objection to Creditor Dantherm S.p.A.’s Reclamation Claim in Amended Claim No. 53-3 on January 6, 2022. However, due to unforeseen technical difficulties, lead counsel has been unable to complete and file said Response by January 6, 2022.

2. Lead counsel for Dantherm contacted counsel for Plan Administrator at regarding the need for an extension due to the unforeseen technical difficulties in order to obtain consent to an extension of time to file Dantherm’s Response.

3. Counsel for the Plan Administrator stated in correspondence dated January 6, 2022, that he has no objection to an extension of time.

4. Counsel for Dantherm and counsel for Plan Administrator are currently in settlement discussion in an effort to resolve Dantherm’s Reclamation Claim.

5. Plan Administrator's Objection to Creditor Dantherm S.p.A.'s Reclamation Claim in Amended Claim No. 53-3 is currently set for hearing on January 13, 2022. However, based on the current settlement discussions, this hearing will likely be continued.

6. Lead counsel for Dantherm requests an extension of time up to, and including, January 13, 2022, to file Dantherm's Response to Plan Administrator's Objection to Creditor Dantherm S.p.A.'s Reclamation Claim in Amended Claim No. 53-3.

7. This motion is not brought for any undue purpose or to cause unnecessarily delay.

WHEREFORE, Dantherm S.p.A. moves this Court for an entry of an order extending the time to file its Response to Plan Administrator's Objection to Creditor Dantherm S.p.A.'s Reclamation Claim in Amended Claim No. 53-3 from January 6, 2022 until January 13, 2022.

Dated: January 6, 2022

Respectfully submitted,  
**DANTHERM S.P.A.**

By: /s/ Robert W. Stephens  
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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on this 6th day of January, 2022, a true and correct copy of the above and foregoing MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAN ADMINISTRATOR' OBJECTION TO CREDITOR'S DANTHERM S.p.A.'s RECLAMATION CLAIM IN AMENDED CLAIM No. 53-3 was filed electronically with the United States Bankruptcy Court for the Eastern District of Missouri and has been served on the parties in interest via e-mail using the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

/s/ Robert W. Stephens